

399 PARK AVENUE 14TH FLOOR NEW YORK, NY 10022-4614 212.704.9600 212.704.4256 fax www.zuckerman.com

PAUL SHECHTMAN
Partner
646-746-8657
PShechtman@zuckerman.com



BY FAX

June 18, 2015

Hon. Gabriel W. Gorenstein United States Magistrate Judge United States Courthouse 500 Pearl Street New York, NY 10007

DOC #_//__

Re: United States v. Michael Oppenheim, Case No. 15 Mag. 1255

Dear Judge Gorenstein:

This is to request a modification of Michael Oppenheim's bail conditions, to which the government consents. At present, Mr. Oppenheim is released on a \$1,000,000 bond secured by his home in Livingston, New Jersey, and is subject to home detention with electronic monitoring. The proposed modification would allow Mr. Oppenheim to be outside the home from 10:00 a.m. to 6:00 p.m., provided that he remained in Morris County or Essex County, New Jersey. (His home is near the border of the two counties.) Also Mr. Oppenheim would be permitted to attend family-related events outside that geographic area (but not outside the District of New Jersey) with the permission, obtained in advance, of his Pretrial Services Officer. The electronic monitoring would continue at all times.

As noted above, AUSA Janis Echenberg has consented to this bail modification after conferring with PSO Kelly Fernandez about it.

Respectfully submitted,

Paul Shechtman

PS/wr

cc:

AUSA Janis Echenberg PSO Kelly Fernandez (via email)

TAMPA

BALTIMORE

WASHINGTON, DC

NEW YORK